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April 5, 2024

VIA ECF

The Honorable Magistrate Judge James L. Cott
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Shanell Martinez v. 189 Chrystie Street Partners, LP, d/b/a The Box, et. al.*
Case No.: 1:22-cv-03111-VEC

Dear Honorable Magistrate Judge Cott:

The undersigned represents Plaintiff Shannell Martinez (“Plaintiff”) in the above-referenced matter. Plaintiff writes, with Defendants’ consent, to respectfully request a two-week extension of the parties’ deadline to file a joint Cheeks motion per this Court’s March 13, 2024, Order from March 8, 2024, to and including April 22, 2024

The parties have worked diligently to meet the March 8, 2024, deadline and have already exchanged drafts of the agreements and the joint Cheeks motion. However, this extension is respectfully requested because Ms. Goddard who was out of the office from March 21, 2024, through April 1, 2024, has fallen ill and has been out of the office from April 3, 2024, through April 5, 2024. Ms. Goddard’s unexpected absence has caused unexpected delays and intervened with the parties’ ability to finalize the agreements and file the join Cheeks motion by the current March 8, 2024, deadline.

This is Plaintiff’s first request for an extension of the parties’ deadline to file the joint Cheeks motion.

We thank the Court for its time and attention to this matter, its consideration of this request, and apologize for filing this request on such short notice.

Respectfully submitted,

GODDARD LAW PLLC

/s/ Megan S. Goddard

By: Megan S. Goddard, Esq.

cc: All counsel [Via ECF]